

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In Re:
Robyn Woodson

Case No.: 15-32423
Judge: Vincent F. Papalia
Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

☒ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

☐ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following
(choose one):

1. ☐ Motion for Relief from the Automatic Stay filed

by _____, creditor,

A hearing has been scheduled for _____, at _____ m.

OR

☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____ m.

☒ Certification of Default filed by M&T Bank, creditor,

I am requesting a hearing be scheduled on this matter.

OR

☐ Certification of Default filed by Standing Chapter 13 Trustee

I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached hereto.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):
From 11/18 - 2/19 My Lupus returned and my employment was severely disrupted which caused my failure to make timely payments. I propose the following which includes late fees:
3/18/19 - payment of \$790.00
4/1/19 - payment of \$1975.00
5/1/19 - payment of \$1975.00

☐ Other (**explain your answer**):

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: March 13, 2019

/s/ Robyn Woodson
Debtor's Signature

Date: _____

Debtor's Signature

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within 14 days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

If this form is not filed the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled.

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Caption in Compliance with D.N.J. LBR 9004-2
(c)

Henry A. Loeb, Esq. ID#028391982

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Attorneys for Debtor

35 N. Bridge Street, Somerville, NJ 08876

(908)526-5400

In Re:

Robyn Woodson

Case No.: 15-32423

Chapter: 13

Adv. No.:

Hearing Date:

Judge: VFP

CERTIFICATION OF SERVICE

1. I, Henry A. Loeb, Esq. :

☒ represent Robyn Woodson in this matter.

☐ am the secretary/paralegal for _____, who represents
_____ in this matter.

☐ am the _____ in this case and am representing myself.

2. On March 13, 2019, I sent a copy of the following pleadings and/or documents

to the parties listed in the chart below.

Chapter 13 Debtor's Certification in Opposition to Creditor's Certification of Default

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: 3/13/2019

/s/ Henry A. Loeb
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Marie-Ann Greenberg, Standing Trustee 30 Two Bridges Road, Suite 330 Fairfield, NJ 07004-1550	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
Denise Carlon, Esq. KML Law Group, PC 216 Haddon Avenue, Suite 406 Westmont, NJ 01108	Attorney for Creditor	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)